

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	
MARK A. SHORETTE	)	CHAPTER 13
<u><b>Debtor(s)</b></u>	)	CASE NO. 22-111017-PMM
CREDIT ACCEPTANCE CORPORATION	)	
<u><b>Moving Party</b></u>	)	11 U.S.C. 362
v.	)	
MARK A. SHORETTE	)	11 U.S.C. 1301
STACY A. DIETZ	)	
<u><b>Respondent(s)</b></u>	)	HEARING DATE: 11-8-22 10:00a
SCOTT F. WATERMAN	)	
<u><b>Trustee</b></u>	)	

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**OBJECTION TO MOTION FOR IN-REM RELIEF FROM THE AUTOMATIC STAY**

**PURSUANT TO 11 U.S.C 362 AND 1301**

**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Objection to the specific proof of the amount outstanding are reserved by the answering Defendant.
5. Admitted.
6. Denied. Objection to the specific proof of the amount outstanding are reserved by the answering Defendant.
7. Denied. It is specifically denied that cause exists to terminate the Automatic Stay.

WHEREFORE, it is suggested that the Debtor be allowed to pursue repayment of the vehicle pursuant to a Chapter 13 Plan and that the relief requested by the Movant be denied.

Respectfully submitted,

/s/ Paul H. Young, Esquire

Paul Howard Young Attorney for Debtor